

## **REMARKS**

The undersigned received a notice of non-compliant amendment indicating that the amendment filed May 12, 2006 was not responsive because it failed to address the rejection of claims 32, 74, and 75. Each of these claims is a dependent claim, and it was noted on page 27 of that response that these claims were allowable for at least the reasons stated above with respect to their parent claims. However, in the interest of clarity, a full explanation of the deficiencies of the Examiner's rejections with respect to these claims is set forth below.

### **Claim 32**

The Examiner rejected claim 32 as unpatentable as obvious over Sudama, FIPS, and in further view of U.S. Patent 5,422,953 to Fischer ("Fischer"). Examiner has correctly noted that claim 32 depends from claim 30. Claim 30 further depends from claim 22, which further depends from claim 1. The rejection of claim 1 was addressed in detail, at pages 22–23 of the previous response. As noted therein, Sudama clearly lacks numerous limitations of claim 1, for example: (1) "locating one or more nodes in a secure location;" (2) "locating one or more nodes in a less secure location;" (3) "allowing no management access to said secure network from nodes located in said less secure locations;" (4) "a first port on a first node sending said management information to a second port on a second node via a communication media exclusively shared by said first port and said second port;" (5) "determining a first list of nodes that may send or receive substantive communication in the secure network." Because claim 32 ultimately depends from claim 1, these limitations are also part of claim 32.

These missing limitations are neither taught nor suggested by Sudama, FIPS, or Fischer. In fact, Fischer bears no relationship to network security and contains no teaching or suggestion relating to networking at all. Therefore, the rejection of claim 32 is improper for at least the same reasons as explained with respect to claim 1. Applicants further reserve the right to address the improper combination of Fischer with Sudama and FIPS at a later date should it become necessary.

#### **Claim 74**

The Examiner rejected claim 74 as unpatentable over Sudama as applied to claim 73 in further view of U.S. Patent 5,694,615 to Thapar et al. (“Thapar”). Examiner has correctly noted that claim 74 depends from claim 73. The rejection of claim 73 was addressed at pages 24–25 of the earlier filed response. As noted therein, Sudama fails to disclose at least: (1) “a plurality of devices including one or more switching and routing devices, any two of said devices able to inter-communicate only by direct links between each other, all devices able to inter-communicate by forwarding communications through each other;” and (2) that “all of said devices carry[] a list of all devices allowed on the network.” Thapar fails to supply this missing limitation. Furthermore, Thapar teaches away from the invention of claim 73, as it is directed to the elimination of a switch from a Fibre Channel arbitrated loop. Thus, not only does Thapar fail to teach each limitation of claim 73, from which claim 74 depends, it actually teaches away from claim 73. Whether it supplies the additional limitations of claim 74 is irrelevant because claim 73 is allowable. Therefore, claim 74, depending therefrom, is necessarily allowable for at least the same reasons. Furthermore, Applicants reserve the right to challenge the improper combination of Thapar with Sudama at a later date, should such become necessary.

#### **Claim 75**

The Examiner rejected claim 75 as unpatentable over Sudama as applied to claim 73 in further view of applicant admitted prior art. However, as noted above, Sudama fails to teach at least: (1) “a plurality of devices including one or more switching and routing devices, any two of said devices able to inter-communicate only by direct links between each other, all devices able to inter-communicate by forwarding communications through each other;” and (2) that “all of said devices carry[] a list of all devices allowed on the network.” Applicants’ admitted prior art (securing computers in a locked room) does not supply either of these limitations of claim 73, which are necessarily limitations of claim 75 as well. Therefore, as previously noted, claim 75 is allowable for at least the same reasons as claim 73, from which it depends.

## **Conclusion**

Therefore, it is respectfully submitted that all pending claims are now in condition for allowance. The independent claims and the deficiencies of the rejections thereof were addressed in detail in the previously filed response. As further noted in the previously filed response, the claims depending therefrom are allowable for at least the same reasons as the claims from which they depend. Reconsideration and withdrawal of the rejections of all pending claims, and a notice of allowance therefore, is therefore requested.

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Respectfully submitted,

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Date

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